



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 23, 2018

By ECF and Interoffice Mail

Honorable Ann M. Donnelly  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States of America v. Jordan Ross Belfort, and  
Delos Living, LLC, Garnishee,*  
Criminal Docket No. CR-98-0859 (AMD) (E.D.N.Y.)

Dear Judge Donnelly:

The government writes to respectfully request a one-week extension of the March 28, 2018, deadline by which the government must submit an opposition to the defendant Jordan Ross Belfort's (the "defendant") memorandum in support of his objection to the garnishment proceedings initiated in the above-referenced case. See February 13, 2018, Electronic Order. The extension request is sought to allow the government additional time to review recent supplemental filings submitted by the defendant on March 16 and 19, 2018, and to determine whether the filings affect the government's positions and arguments. Additionally, we respectfully request a corresponding adjournment of the April 4, 2018, before Your Honor, to a date on or after April 19, 2018. Counsel for the defendant consents to this extension request.

By way of background, the Court set a briefing schedule concerning the defendant's objection to the garnishment proceedings, with the defendant's memorandum in support of his objection due by March 14, 2018, and the government's opposition to the memorandum due by March 28, 2018. See February 13, 2018, Electronic Order. The defendant's submissions were filed by March 14, 2018. See Docket Entries 215-216. However, two days later, the defendant submitted a "supplemental memorandum," and a declaration by the defendant's counsel, attaching a copy of a "Termination and Release Agreement," filed under seal. See Docket Entries 218-219. Three days later, the defendant filed a letter and a "corrected copy" of the supplemental memorandum. See Docket Entries 220-221.

The “Termination and Release Agreement” submitted by the defendant is a lengthy, complex contract.<sup>1</sup> Unfortunately, the undersigned Assistant U.S. Attorney was not in the office on Monday, March 19, 2018, and our office was closed on Wednesday, March 21, 2018, due to inclement weather. The undersigned Assistant U.S. Attorney has not had an opportunity to carefully scrutinize the “Termination and Release Agreement.” We respectfully request additional time to review the terms of the “Termination and Release Agreement” in order to determine whether they have any impact on the government’s position with respect to the defendant’s objection or require additional research for the government’s opposition memorandum.

Additionally, we also respectfully request a brief, corresponding adjournment of the April 4, 2018, hearing, in order to allow the Court sufficient time to review the parties' submissions prior to a hearing. Accordingly, we respectfully request that the Court adjourn the April 4 hearing to a date on or after April 19, 2018, convenient for the Court.

We thank the Court for its consideration of these requests.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
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cc: Sharon Cohen Levin, Esq. (via ECF)  
Wilmer Cutler Pickering Hale and Dorr LLP  
*Attorneys for Defendant Jordan Ross Belfort*

<sup>1</sup> We will refrain from further describing the contract, or its contents, while the document is under seal, pending the Court's ruling on the defendant's application to file documents under seal.